Declaration of William L. Simmons

I, William L. Simmons, declare and state:

- 1. My name is William L. Simmons. I am currently employed by Clean Harbors El Dorado, LLC. ("CHEL") as Maintenance Manager. My business address is 309 American Circle, El Dorado, AR 71730, and my business telephone number is (870) 863-7173.
- 2. I make this declaration in connection with an enforcement action initiated by the United States Environmental Protection ("EPA") with respect to CHEL's operating procedures at its facility located at 309 American Circle, El Dorado, AR 71730 ("Facility").
- 3. I have been employed as Maintenance Manager at the Facility since 4-01-2009
- 4. My responsibilities as Maintenance Manager include monitoring the carbon adsorption systems ("carbon canisters") installed on the Facility's permitted hazardous waste storage and treatment tanks, and replacing the existing carbon with fresh carbon when the results of such monitoring indicate that carbon breakthrough has occurred.
- 5. The Facility's standard operating procedure calls for replacing existing carbon with fresh carbon within twenty four (24) hours of indication of carbon breakthrough, and it was standard practice to perform such replacements accordingly.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on

2013 at El Dorado, Arkansas.

William L. Simmons

Declaration of Jerry Funderburg

I, Jerry Funderburg, declare and state:

- 1. My name is Jerry Funderburg. I am currently employed by Clean Harbors El Dorado, LLC. ("CHEL") as a Sampler of CC canisters. My business address is 309 American Circle, El Dorado, AR 71730, and my business telephone number is (870) 863-7173.
- 2. I make this declaration in connection with an enforcement action initiated by the United States Environmental Protection ("EPA") with respect to CHEL's operating procedures at its facility located at 309 American Circle, El Dorado, AR 71730 ("Facility").

3. I have been employed as a Sampler of CC canisters at the Facility since

- 4. My résponsibilities as a Sampler of CC canisters include monitoring the carbon adsorption systems ("carbon canisters") installed on the Facility's permitted hazardous waste storage and treatment tanks, and replacing the existing carbon with fresh carbon when the results of such monitoring indicate that carbon breakthrough has occurred.
- 5. The Facility's standard operating procedure calls for replacing existing carbon with fresh carbon within twenty four (24) hours of indication of carbon breakthrough, and it was standard practice to perform such replacements accordingly.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on	8-7	_, 2013	at E	E1 :	Dorado,	Arkansas	;.

Declaration of Donald Miller

I, Donald Miller, declare and state:

- My name is Donald Miller. I am currently employed by Clean Harbors El Dorado, LLC. ("CHEL") as a Facility Technician. My business address is 309 American Circle, El Dorado, AR 71730, and my business telephone number is (870) 863-7173.
- 2. I make this declaration in connection with an enforcement action initiated by the United States Environmental Protection ("EPA") with respect to CHEL's operating procedures at its facility located at 309 American Circle, El Dorado, AR 71730 ("Facility").
- 3. I have been employed as Facility Technician at the Facility since
- 4. My responsibilities as Facility Technician include monitoring the carbon adsorption systems ("carbon canisters") installed on the Facility's permitted hazardous waste storage and treatment tanks, and replacing the existing carbon with fresh carbon when the results of such monitoring indicate that carbon breakthrough has occurred.
- 5. The Facility's standard operating procedure calls for replacing existing carbon with fresh carbon within twenty four (24) hours of indication of carbon breakthrough, and it was standard practice to perform such replacements accordingly.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on $9-7-\dots$, 2013 at El Dorado, Arkansas.

Donald Miller

Declaration of James Pennington

I, James Pennington, declare and state:

- 1. My name is James Pennington. I am currently employed by Clean Harbors El Dorado, LLC. ("CHEL") as a Sampler of CC canisters. My business address is 309 American Circle, El Dorado, AR 71730, and my business telephone number is (870) 863-7173.
- 2. I make this declaration in connection with an enforcement action initiated by the United States Environmental Protection ("EPA") with respect to CHEL's operating procedures at its facility located at 309 American Circle, El Dorado, AR 71730 ("Facility").
- 3. I have been employed as a Sampler of CC canisters at the Facility since
- 4. My responsibilities as a Sampler of CC canisters include monitoring the carbon adsorption systems ("carbon canisters") installed on the Facility's permitted hazardous waste storage and treatment tanks, and replacing the existing carbon with fresh carbon when the results of such monitoring indicate that carbon breakthrough has occurred.
- 5. The Facility's standard operating procedure calls for replacing existing carbon with fresh carbon within twenty four (24) hours of indication of carbon breakthrough, and it was standard practice to perform such replacements accordingly.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on <u>8-7-</u>, 2013 at El Dorado, Arkansas.

James Pennington

Declaration of Craig Hudson

I, Craig Hudson, declare and state:

- 1. My name is Craig Hudson. I am currently employed by Clean Harbors El Dorado, LLC. ("CHEL") as Supervisor of Labor Pool. My business address is 309 American Circle, El Dorado, AR 71730, and my business telephone number is (870) 863-7173.
- 2. I make this declaration in connection with an enforcement action initiated by the United States Environmental Protection ("EPA") with respect to CHEL's operating procedures at its facility located at 309 American Circle, El Dorado, AR 71730 ("Facility").
- 3. I have been employed as Supervisor of Labor Pool at the Facility since
- 4. My responsibilities as Supervisor of Labor Pool include monitoring the carbon adsorption systems ("carbon canisters") installed on the Facility's permitted hazardous waste storage and treatment tanks, and replacing the existing carbon with fresh carbon when the results of such monitoring indicate that carbon breakthrough has occurred.
- 5. The Facility's standard operating procedure calls for replacing existing carbon with fresh carbon within twenty four (24) hours of indication of carbon breakthrough, and it was standard practice to perform such replacements accordingly.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on _______, 2013 at El Dorado, Arkansas.

Craig Hudson